

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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**DECLARATION OF JOHN M. MALOY, ESQ. IN SUPPORT OF AKRAM
ALZAMARI'S OPPOSITION TO PLAINTIFFS' MOTION AND MEMORANDUM OF
LAW IN SUPPORT TO CONDUCT AN ORAL DEPOSITION**

John M. Maloy, Esq., hereby declares under the penalty of perjury that:

1. I am an attorney duly admitted before the Courts of New York State and this Court, am an associate of Morgan, Lewis & Bockius LLP, and am familiar with the litigation and prior proceedings relevant to the subject motion.
2. I submit this declaration in support of Akram Alzamari's Opposition to Plaintiffs' Motion and Memorandum of Law in Support to Conduct an Oral Deposition pursuant to the Fed. R. Civ. P. 26 and 30.
3. Attached hereto as Exhibit 1 (filed under seal) is a true and accurate copy of the May 15, 2020 declaration of John M. Maloy.
4. Attached hereto as Exhibit 2 (filed under seal) is a true and accurate copy of the April 21, 2020 declaration of Plaintiffs' investigator Catherine Hunt.
5. Attached hereto as Exhibit 3 (filed under seal) is a true and accurate copy of Akram Alzamari's April 30, 2019 Letter Motion for Protective Order and Opposition to Letter Motion to Compel.
6. Attached hereto as Exhibit 4 (filed under seal) is a true and accurate copy of Akram Alzamari's August 21, 2019 Objections to Plaintiffs' Notice of Deposition and Direct and Re-direct Examination Questions.

7. Attached hereto as Exhibit 5 (filed under seal) is a true and accurate copy of Kelly A. Moore's November 11, 2019 letter to Judge Netburn concerning the written deposition of Akram Alzamari.

8. Attached hereto as Exhibit 6 (filed under seal) is a true and accurate copy of Andrew J. Maloney's February 11, 2020 email concerning deposition questions for Akram Alzamari and the attachments to Andrew J. Maloney's February 11, 2020 email.

9. Attached hereto as Exhibit 7 (filed under seal) is a true and accurate copy of the direct examination questions from Akram Alzamari's March 11, 2020 deposition.

10. Attached hereto as Exhibit 8 (filed under seal) is a true and accurate copy of [REDACTED]

[REDACTED]

[REDACTED]

11. Attached hereto as Exhibit 9 (filed under seal) is a true and accurate copy of [REDACTED]

[REDACTED]

[REDACTED]

12. Attached hereto as Exhibit 10 (filed under seal) is a true and accurate copy of [REDACTED]

[REDACTED]

[REDACTED]

13. Attached hereto as Exhibit 11 (filed under seal) is a true and accurate copy of Andrew J. Maloney's March 3, 2020 email concerning deposition questions for Akram Alzamari without the attachments.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of May 2020.

/s/ John M. Maloy
John M. Maloy